

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

NO. 05 10218 RCL

V.

JESSE WILSON

EX PARTE MOTION FOR SERVICES OTHER THAN COUNSEL

NOW COMES the accused, Jesse Wilson, by and through counsel, and hereby moves this Court to authorize investigative services and for payment of same by the Government.

In support of this Motion, the accused states as follows:

1. The accused is charged with a felon in possession of firearm and ammunition.
2. That investigative services are required in order to locate and interview witnesses (there were two other individuals in the car in which the accused allegedly possessed the firearm), obtain evidence and review arrest scene.
3. That the accused is indigent and unable to pay for said services.
4. That in the event this Motion is granted, the firm of David McClanahan would be retained to perform said investigative services. That Mr. McClanahan charges \$75.00 per hour.

WHEREFORE, the accused respectfully requests that this Court grant the within Motion

and authorize \$2,000.00 for investigative services.

Respectfully submitted,
Jesse Wilson,
By his Attorney,

Date: October 4, 2005

/S/ Paul J. Garrity
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